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9 Attorneys for Keolis Transit Services, LLC

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ERIC TAYLOR, individually

Case No.: 2:20-cv-778

Plaintiff,

vs.

**Keolis Transit Services, LLC's  
Answer to Complaint**

LOYD GRANDT, an individual; KEOLIS  
TRANSIT SERVICES, LLC., a foreign  
corporation; DOES 1 through 20; ROE  
CORPORATIONS 1 through 10 AND ROE  
LIMITED LIABILITY COMPANIES 1 though 10,  
inclusive.

Defendant.

Keolis Transit Services, LLC requests a jury trial per Rule 38 and answers the complaint as follows:

1. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this paragraph, so it denies them.
2. Deny.
3. Admit.
4. Admit.
5. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this paragraph, so it denies them.
6. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this paragraph, so it denies them.

- 1 7. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this
- 2 paragraph, so it denies them.
- 3 8. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this
- 4 paragraph, so it denies them.
- 5 9. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this
- 6 paragraph, so it denies them.
- 7 10. Admit, except that Keolis does not own the bus.
- 8 11. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this
- 9 paragraph, so it denies them.
- 10 12. Keolis lacks knowledge sufficient to determine the accuracy of the allegation in this
- 11 paragraph, so it denies them.
- 12 13. Deny.
- 13 14. Keolis repeats its responses to the prior paragraphs.
- 14 15. Deny.
- 15 16. Deny.
- 16 17. Deny.
- 17 18. Deny.
- 18 19. Deny.
- 19 20. Deny.
- 20 21. Deny.
- 21 22. Keolis repeats its responses to the prior paragraphs.
- 22 23. Admit.
- 23 24. Admit.
- 24 25. If Mr. Grant was negligent and Plaintiff sustained damages, then admit.
- 25 26. Deny.
- 26 27. Deny.
- 27 28. Deny.
- 28 29. Keolis repeats its responses to the prior paragraphs.

1 30. Deny.  
2 31. Deny.  
3 32. Admit.  
4 33. Admit.  
5 34. Deny.  
6 35. Deny.  
7 36. Deny.  
8 37. Deny.  
9 38. Deny.  
10 39. Deny.  
11 40. Deny.  
12 41. Keolis repeats its responses to the prior paragraphs.  
13 42. Keolis admits Mr. Grant was within the course and scope of his employment with Keolis at  
14 the times relevant to this complaint. If Mr. Grant was negligent and Plaintiff sustained  
15 damages, then the rest of the allegations in this paragraph are also admitted.  
16 43. If Mr. Grant was negligent and Plaintiff sustained damages, then admit.  
17 44. Deny.

18 **Affirmative Defenses**

19 1. Respondeat superior is not an independent cause of action.  
20 2. Plaintiff was comparatively negligent.  
21 3. Plaintiff has not mitigated his damages.

22 **Request for Relief**

23 Keolis requests the case be dismissed with prejudice.

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1 DATED this 30<sup>th</sup> day of April, 2020.



BY: /s/ Michael P. Lowry

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Attorneys for Keolis Transit Services, LLC

### **Certificate of Service**

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on April 30, 2020, I served **Keolis Transit Services, LLC's Answer to Complaint** as follows:

- by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Pacific West Injury Law  
Kristopher Helmick, Esq.  
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Las Vegas, NV 89118  
P: 702-602.4878

BY: /s/ Amanda Hill

An Employee of

